



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

July 7, 2006

Bruce Kaiser  
Town Administrator  
Town of Jamestown  
93 Narragansett Avenue  
Jamestown, RI 02835-1199

Re: Approval of the 50% Landfill Closure Design  
Jamestown, Rhode Island

Dear Mr. Kaiser:

The Office of Waste Management (OWM) has received and reviewed the document entitled: *Remedial Action Work Plan and 50% Design Drawings Former Jamestown Landfill, Jamestown, RI*, dated December 28, 2006. The Department is approving the plan subject to the attached comments and conditions being satisfactorily addressed in the submission of the 90% Design.

Additionally, a summary package is attached with appendices, which was generated in response to the public comments received regarding this 50% design document. The package contains both a summary of the comments received, as well as the Department's responses. Due to the significant public interest in this package we are requesting that you make the comments available at the public library. We also intend to post the responses on our web site.

If you have any questions regarding this letter please contact Chris Walusiak at (401) 222-2797 ext. 7135.

Sincerely,

Leo Hellested, Chief  
Office of Waste Management  
Department of Environmental Management

cc: Dr. Michael Sullivan, Director, RIDEM  
Terrence Gray, Associate Director for Air, Waste, & Compliance - RIDEM  
Alicia Good, Associate Director, Water Resources - RIDEM  
Brian Wagner, esq. RIDEM Legal  
Mark Dennen, RIDEM Office of Waste Management  
Chris Walusiak, RIDEM Office of Waste Management  
Michael Gray, Town of Jamestown  
Ed Summerly, GZA  
Norma Willis, NECC

**RIDEM Comments regarding the  
RAWP and 50% Design Drawings  
Former Jamestown Landfill  
Jamestown, Rhode Island**

Prepared July 6, 2006

**1. General**

Please provide additional information regarding the presence or absence of underdrains at the proposed DPW facility. Also drawings should clearly show where underdrains and subdrains will discharge.

**2. Page 2, Section 2.30 SIR SUMMARY, Second Bullet**

Please clarify the basis upon which the soils over the waste were characterized as low permeability reworked native Glacial Till.

**3. Page 5, Section 3.22 DPW Facility Subgrade Preparation, Second Paragraph**

Excavated solid waste shall be disposed of at a licensed solid waste management facility in accordance with RIDEM Solid Waste Regulations and may not be used onsite for grading and shaping purposes. The Department will allow the Town of Jamestown to screen the solid waste in order to remove the soil. This activity shall be performed at the transfer station facility. An amendment to the Transfer Station's operating plan shall be submitted to the Department detailing the equipment and screening procedures.

Soil excavated from within the landfill limits and screened may be incorporated under the upper paved area provided the soil sampling results are within the parameters set forth in the approved Soils Management Plan. Furthermore, the Town of Jamestown shall provide a contingency plan that details the measures that will be used to prevent and mitigate dust and odors during the excavation and screening activities.

**4. Page 6, Section 3.23.2 DPW Facility Storm water Collection System, General**

Due to the re-use option chosen for the site, some aspects of the proposal go beyond the requirements to remediate and close the landfill. Such actions do not qualify for the exemption from wetlands permitting requirements under Section 6.08 of the *Rules and Regulations Governing Enforcement of the Freshwater Wetlands Act* afforded to remediation activities. The Town therefore, shall submit a Preliminary Determination Application or a formal permit application to the RIDEM Office of Water Resources – Division of Freshwater Wetlands for the additional improvements. This review will determine whether the storm water collection system design meets Freshwater Wetlands Regulations as well as RIPDES Regulations.

**5. Page 8, Section 3.23.4 Sub-Slab Ventilation System**

The Department will require additional information in subsequent design submittals regarding the building's continuous methane monitoring system. This information shall include: the proposed number of monitoring points, alarm thresholds and contingency plans for alarm situations.

**6. Page 8, Section 3.31 Compost Area Expansion**

The Department maintains its position that the area designated for composting shall be paved.

**7. Page 8, Section 3.35 Roadway Surfaces and Entrance**

The access road to the upper storage area shall have a paved surface over the landfill cap. The 90% Design should include details of road construction and grading.

**8. Page 9, Section 4.11 Landfill Cap, Third Paragraph**

Material used for the final vegetative cover shall be uncontaminated soil with properties consistent with the use of the property.

**9. Page 9, Section 4.11 Landfill Cap, Third Paragraph**

Solid waste generated during the demolition of the existing pavilion structures shall be disposed of as per comment #1. Other material that is incorporated under the paved upper storage area must not meet the definition of a solid waste. If crushed concrete is placed beneath the cap it must be free of any re-bar material.

**10. Page 18, Section 6.00 COMPLIANCE DETERMINATION**

It should be noted, that upon receipt, review and approval of the Remedial Action Completion Report (or Closure Certification Report) the Town will receive an Interim Letter of Compliance. The Interim Letter of Compliance serves the purpose of the Certificate of Closure. Upon completion of the post closure monitoring period outlined in the approved Environmental Monitoring Plan (EMP), the Town will receive a Letter of Compliance.

**11. Page 3, Appendix B, Soils Management Plan and Waste Handling Contingency Plan, Soil and Waste Management Plan**

All soil/waste material that is excavated and mechanically screened shall be laboratory tested in accordance with the Department approved soil/waste stockpile sampling plan. Soil screenings below the Method 1 Industrial/Commercial Direct Exposure Criteria (Table 1, *Remediation Regulations*) and the Method 1 Leachability Criteria (Table 2, *Remediation Regulations*) may be incorporated beneath the paved upper storage area. Solid waste retained during mechanical screening and soil material that does not meet the

above listed criteria shall be disposed of offsite at an appropriately licensed solid waste management facility.

**12. Page 3, Appendix B, Soils Management Plan and Waste Handling Contingency Plan, Soil and Waste Management Plan, Solid Waste Excavation Practices**

During solid waste excavation and screening activities, a combustible gas meter that monitors % LEL, % oxygen and hydrogen sulfide concentrations shall be used in addition to a PID.

**13. Page 5, Appendix B, Soils Management Plan and Waste Handling Contingency Plan, Soil and Waste Management Plan, Soil and Solid Waste Stockpiling/Storage Practices, Stockpiling and Mechanical Screening of Solid Waste.**

The 90% Design shall include additional information regarding the approximate size and location of the proposed waste stockpiles. In addition, the Town shall submit a description of the proposed screening process that will serve as the proposed amendment to the current transfer stations operation and should include at a minimum:

- the size of the screening operation (cubic yards of waste screened per day),
- a site figure that includes the location of the screening operation within the transfer station facility and delineates the areas to be excavated within the footprint of the landfill,
- dust/odor control measures,
- screen size diameter, and
- screening area buffer zones/access restrictions

**14. Appendix E, ENVIRONMENTAL LAND USE RESTRICTION, General**

Please provide details on how annual inspections provided under the ELUR will monitor settlement of the landfill and ensure minimum slope requirements will be maintained.

**15. Figure C-8, 2" PVC Water Main Trench Section (1 – ¼" PVC Sewer Main Typical)**

All utility trenches excavated in areas within the waste footprint shall be backfilled with clean soil. Trenches located within the waste footprint areas shall be surveyed and contain a tracer line for location during repair (to avoid the unnecessary excavation of solid waste). In addition, the selection of pipe material shall be justified as compatible with the use (compaction) and leachate characteristics.

**16. Figure C-8, DRAINAGE SWALE & RETAINING WALL DETAIL**

Please provide additional details regarding the type, and permeability characteristics of the “GEO-SYNTHETIC TO BE PLACED AGAINST TRASH LAYER” and discuss how the design will limit the possible collection of leachate in the 6” SLOTTED WALL DRAIN.